

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

JILL HINES ET AL * CASE NO. 3:23-CV-571
VERSUS * CHIEF JUDGE TERRY A. DOUGHTY
ALEX STAMOS ET AL * MAG. JUDGE KAYLA D. MCCLUSKY
* * * * *

DEFENDANTS' JOINT UNOPPOSED MOTION TO SET JANUARY 9, 2026
AS THE DEADLINE TO FILE A REPLY IN SUPPORT OF
THEIR RENEWED MOTION TO DISMISS

NOW INTO COURT, through undersigned counsel, come Defendants Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, Leland Stanford Junior University, Kate Starbird, Graphika, Camille François, Atlantic Council, and Graham Brookie (collectively, “Defendants”), who respectfully request a one-week extension of time—from January 2 to January 9, 2026—to file a Reply in Support of their Renewed Motion to Dismiss. In support of this Motion, Defendants state as follows:

1. On April 11, 2025, the Court entered a briefing schedule for Defendants’ motion to

dismiss, triggered off discovery deadlines. Under this briefing schedule, the deadline for Plaintiffs’ opposition was “30 days after Defendants’ Motions to Dismiss are filed,” and the reply deadline is “30 days after Plaintiffs’ Oppositions are filed.” D.E. 164 at 2; *see also* D.E. 180.

2. On October 10, 2025, after jurisdictional discovery closed, Plaintiffs filed a Notice

of Briefing Schedule. D.E. 189. The notice states that, per the Court’s scheduling orders, the motion to dismiss deadline was November 10, the deadline for Plaintiffs to file oppositions to any motions to dismiss is December 10, 2025, and the deadlines for Defendants to file replies in support of any motions to dismiss is January 9, 2026. *Id.*

3. Defendants filed their Renewed Motion to Dismiss on November 10, 2025. *See* D.E. 191. On November 12, 2025, the clerk of court referred the motion to dismiss to Judge McClusky and entered a notice pursuant to the ordinary deadlines in the local rules stating that the response deadline was December 3, 2025 and the reply deadline was seven days after the response is filed. D.E. 193. The motion to dismiss was subsequently transferred back to Judge Doughty.

4. Plaintiffs filed their Opposition to Defendants' Renewed Motion to Dismiss on December 3, 2025. *See* D.E. 198.

5. Under the Court's scheduling order (D.E. 164), Defendants' Reply is due thirty days after Plaintiffs' Opposition brief. This means that Defendants' Reply is currently due on January 2, 2026.

6. Defendants respectfully request that the Court extend the reply deadline until January 9, 2026 in light of the upcoming holidays and holiday travel schedules, as well as in light of the extensive coordination required for four separately-represented groups of defendants (the three Stanford defendants, Kate Starbird, the two Graphika defendants, and the two Atlantic Council defendants) to file a single reply brief. In addition, Defendants note that Plaintiffs have attached a significant number of documents produced in discovery to the opposition brief that Defendants will need to address in the reply, as well as hundreds of pages of other documents.

7. Defendants make this request in good faith and not for the purpose of undue delay.

8. Counsel for Defendants have conferred with counsel for Plaintiffs, and Plaintiffs consent to the requested extension of time.

9. Pursuant to Western District of Louisiana Local Rule 7.9, attached to this motion is a certificate by undersigned counsel that consent was sought for the extension requested herein, and that Plaintiffs do not oppose the extension sought by this Motion.

WHEREFORE, Defendants request that the Court grant this motion and enter an order extending the deadline for Defendants to file a Reply in support of their Renewed Motion to Dismiss to January 9, 2026.

December 4, 2025

/s/ Camala E. Capodice

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 4, 2025, I filed the foregoing via the Court's CM/ECF system which will send notification of such filing to all counsel of record.

/s/ James Brown

James Brown